

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: WAVE 4 CASES ON ATTACHED EXHIBIT A	

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS
AND TESTIMONY OF TED ROTH, MD**

Plaintiffs respectfully request that the Court preclude defense expert Ted Roth, M.D., from giving opinions on: (1) the adequacy of Defendants' product warnings and instructions for use ("IFU"); (2) the design of Defendants' transvaginal mesh products at issue, including whether or not the design of those devices is reasonable; (3) any opinions regarding the safety and efficacy of TVT or TVT-O, or in the alternative, any opinions regarding differences in safety and efficacy rates between the TVT mechanically cut mesh and the TVT laser cut mesh; and (4) his statements about the safety and efficacy of Defendants' products based on his own practice. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

Dated: April 13, 2017

Respectfully submitted,

/s/ Jeffrey M. Kuntz

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on April 13, 2017 using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Jeffrey M. Kuntz
Attorney for Plaintiffs